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November 6, 2017

VIA REGULAR MAIL AND EMAIL

Eugene F. Assaf, Esq.
Kirkland & Ellis
655 Fifteenth Street
Washington D.C. 20005

RE: Williams

Dear Gene:

I write in response to your letter of November 6, 2107. Your letter does not accurately reflect all that we discussed during our November 1, 2017 meet and confer, including information on the Bevan files.

Although the intent of the meet and confer of November 1, 2017, was to discuss a joint scheduling order, I raised a question of how to proceed with the production of the Bevan files in accordance with Judge Rivera- Soto's recent order in light of the information I had on the files under Mr. Bevan's control. You asked me to look into some questions about the files, which I agreed to do.

Accordingly, I wrote to you on November 3 and again on November 4th offering to meet with you early this week to continue our discussions and provide answers to your questions with the objective of arriving at an agreed upon protocol for production of the Bevan files. You responded on November 5, 2017 indicating that the dates proposed were not good for you but that you were available to meet on November 15, 16 or 17. I responded first thing this (November 6) morning that although I was heavily involved with NJAJ Meadowlands continuing education seminars occurring on the dates you proposed, I would adjust my schedule to meet with you on the 16th.

Before involving the Court, I suggest that we meet as intended and see if we can agree on a protocol for the production of the Bevan information consistent with Justice Rivera-Soto's direction.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Chris Mott". The signature is fluid and cursive, with a large loop at the end.

For the Firm

/aem